UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA, SUITE 7000
#48 165 RD. KM 1.2
GUAYNABO, PR 00968-8069

JUN 09 2015

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
Article Number: 7009 2250 0000 9163 5294

Noelia Y. Rosa Jaime
Director
Environmental Compliance and Planning Office
Autonomous Municipality of San Juan
P.O. Box 70179
San Juan, Puerto Rico 00936-8179

Irma López
Director
Compliance and Quality Control Directorate
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
San Juan, Puerto Rico 00916-9990

Re: Reconnaissance Inspection within the Autonomous Municipality of San Juan (MSJ) and Puerto Rico Aqueduct and Sewer Authority (PRASA) Collection Systems.
Autonomous Municipality of San Juan (MSJ) MS4 (PRR040036)
Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto Nuevo Wastewater Treatment Plant Collection System (PR0021555)

Dear Mrs. Rosa and López:

On May 28, 2015, the United States Environmental Protection Agency's (EPA) Region 2 inspectors Alex Rivera, Carlos Villafañe and Murray Lantner conducted a reconnaissance inspection of the Puerto Rico Aqueduct and Sewer Authority (PRASA) wastewater collection system and the Municipality of San Juan (MSJ) MS4 located in University Gardens Residential Development in San Juan, Puerto Rico.

The inspection was conducted pursuant to the authority contained in Section 308 of the Clean Water Act, 33 U.S.C. 1251 et seq., 40 CFR 122.41(a)(2), & (i) 1,2,3 and in accordance with Agency wide acceptable guidance and procedures. The findings are included in the Water Compliance Inspection Report enclosed. The results of the inspection performed by EPA found PRASA's and MSJ's collection system in non-compliance with their respective National Pollutant Discharge Elimination System (NPDES) permits and in violation of the Clean Water Act.

Within forty five (45) days of receipt of this letter, respond to EPA-CEPD in writing with the actions that MSJ and PRASA has taken or will take to address the non-compliance items and other issues identified in the report. If the item has already been addressed also please note that in your response. However, if these items require extensive repairs and/or capital investments, then the work shall be scheduled in consideration of other priorities and the details shall also be informed to EPA.

Also send a copy of your response to Wanda E. García Hernández, Director, Water Quality Area, EQB, Puerto Rico Environmental Quality Board, P.O. Box 11488, Santurce, Puerto Rico 00910

If you have any questions please feel free to contact Alex O. Rivera of my staff at 787-977-5845.

Sincerely,

Jaime Géliga
Chief
Municipal Water Program Branch
Caribbean Environmental Protection Division

Enclosure

cc: Wanda E. García Hernández, Director, Water Quality Area, PREQB
Emma Blanco, PRASA Metro Region Compliance (via email)
William Díaz, PRASA Metro Region Compliance (via email)
Héctor Cepeda, PRASA Metro Region Compliance (via email)
Yanira Cosme, PRASA Metro Region Operations (via email)
Christie Mota, PRASA Metro Region San Juan Area Operations (via email)
Juan Pérez, PRASA (via email)
Alexander Ávila, MSJ (via email)
Maylene Pérez, MSJ (via email)
Omar Pérez, SJBEP (via email)

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JUN 0 9 2015

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Irma López
Director
Compliance and Quality Control Directorate
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
San Juan, Puerto Rico 00916-9990

Re: Reconnaissance Inspection within the Autonomous Municipality of San Juan (MSJ) and Puerto Rico Aqueduct and Sewer Authority (PRASA) Collection Systems.
Autonomous Municipality of San Juan (MSJ) MS4 (PRR040036)
Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto Nuevo Wastewater Treatment Plant Collection System (PR0021555)

Dear Mrs. Rosa and López:

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The inspection was conducted pursuant to the authority contained in Section 308 of the Clean Water Act, 33 U.S.C. 1251 et seq., 40 CFR 122.41(a)(2), & (i) 1,2,3 and in accordance with Agency wide acceptable guidance and procedures. The findings are included in the Water Compliance Inspection Report enclosed. The results of the inspection performed by EPA found PRASA's and MSJ's collection system in non-compliance with their respective National Pollutant Discharge Elimination System (NPDES) permits and in violation of the Clean Water Act.

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If you have any questions please feel free to contact Alex O. Rivera of my staff at 787-977-5845.

Sincerely,

Jaime Géliga
Chief
Municipal Water Program Branch
Caribbean Environmental Protection Division

Enclosure

cc: Wanda E. García Hernández, Director, Water Quality Area, PREQB
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William Díaz, PRASA Metro Region Compliance (via email)
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Juan Pérez, PRASA (via email)
Alexander Ávila, MSJ (via email)
Maylene Pérez, MSJ (via email)
Omar Pérez, SJBEP (via email)

United States Environmental Protection Agency Washington, D.C. 20460

Water Compliance Inspection Report

Form Approved.
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2	3 PR0021555 11	12 150528 17			18-19 R201

Remarks

21 UNNACEPTABLE 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved
67 0.2 69	70 U	71	72	73747580

Section B: Facility Data

Name and Location of Facility Inspected *(for industrial users discharging to POTW, also include POTW name and NPDES permit number)*

PRASA Puerto Nuevo RWWTP Collection System (PR0021555)
University Gardens Residential Development Collection System

Entry Time/Date Permit Effective Date: 2:00 PM May 28, 2015

Exit Time/Date Permit Expiration Date: 3:50 PM May 28, 2015

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

N/A

Other Facility Data – Other Responsible Officials

Name, Address of Responsible Official/Title/Phone and Fax Number(s)

Roberto Martínez
Director
PRASA Metro Region
939-292-6690

Contacted: Yes [ ] No [x]

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

[ ]	Permit	[ ]	Flow Measurement	[X]	Operations & Maintenance CSO/SSO (Sewer Overflow)
[ ]	Records/Reports	[ ]	Self-Monitoring Program	[ ]	Sludge Handling/Disposal Pollution Prevention
[ ]	Facility Site Review	[ ]	Compliance Schedules	[ ]	Pretreatment Multimedia
[ ]	Effluent/Receiving Water	[ ]	Laboratory	[ ]	Storm Water

Section D: Summary of Findings/Comments *(Attach additional sheets of narrative and checklists as necessary)*

See Enclosed Report

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers Date
Alex O. Rivera, Environmental Engineer	6/8/15 U.S. EPA Region 2-CEPD - 787-977-5845 rivera.alex@epa.gov
Carlos Villafañe, Environmental Engineer	U.S. EPA Region 2-CEPD - 787-977-5858 villafane.carlos@epa.gov
for Murray Lantner, Environmental Engineer	6/8/15 U.S. EPA Region 2 DECA – 212-637-3976 lantner.murray@epa.gov
Signature of Management Q A Reviewer: Jaime Geliga, Chief, CEPD-MWPB	Agency/Office/Phone and Fax Numbers Date: U.S. EPA Region 2, CEPD MWPB 6/9/15 787-977-5840 geliga.jaime@epa.gov

United States Environmental Protection Agency Washington, D.C. 20460

Water Compliance Inspection Report Form Approved.
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2	3 PRR040036 11	12 150528 17			18-19 R201

Remarks

21 UNNACEPTABLE 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 0.2 69	70 U	71	72	73747580

Section B: Facility Data

Name and Location of Facility Inspected *(for industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Autonomous Municipality of San Juan (MSJ) MS4 (PRR040036)
University Gardens Residential Development Collection System

Entry Time/Date Permit Effective Date
2:00 PM
May 28, 2015

Exit Time/Date Permit Expiration Date
3:50 PM
May 28, 2015

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Alexander Ávila, MSJ MS4 Inspector, 787-480-2256,
aavila@sanjuanciudadpatria.com
Virginio Matos, MSJ MS4 Inspector, vmatos@sanjuanciudadpatria.com
Carmen I. Rivera, MSJ MS4 Program, crivera10@sanjuanciudadpatria.com

Other Facility Data – Other Responsible Officials

See Enclosed Report

Name, Address of Responsible Official/Title/Phone and Fax Number(s)

Noelia Y. Rosa Jaime
Director
Municipality of San Juan Environmental Compliance
and Planning Office
787-787-480-2253

Contacted: Yes [ ] No [x]

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

	Permit		Flow Measurement		Operations & Maintenance CSO/SSO (Sewer Overflow)
	Records/Reports		Self-Monitoring Program		Sludge Handling/Disposal Pollution Prevention
	Facility Site Review		Compliance Schedules		Pretreatment Multimedia
X	Effluent/Receiving Water		Laboratory	X	Storm Water

Section D: Summary of Findings/Comments *(Attach additional sheets of narrative and checklists as necessary)*

See Enclosed Report

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers Date
Alex O. Rivera, Environmental Engineer	U.S. EPA Region 2-CEPD - 787-977-5845 - rivera.alex@epa.gov 6/8/15
Carlos Villafañe, Environmental Engineer	U.S. EPA Region 2-CEPD - 787-977-5858 villafane.carlos@epa.gov
for Murray Lantner, Environmental Engineer	U.S. EPA Region 2 DECA – 212-637-3976 lantner.murray@epa.gov 6/9/15
Signature of Management Q A Reviewer Jaime Geliga, Chief, CEPD-MWPB	Agency/Office/Phone and Fax Numbers Date U.S. EPA Region 2, CEPD MWPB 787-977-5840 – geliga.jaime@epa.gov 6/9/15

SUPPLEMENT TO WATER COMPLIANCE INSPECTION REPORT FORM
(EPA FORM 3560-3 (REV 9-94))

UNIVERSITY GARDENS RESIDENTIAL DEVELOPMENT WASTEWATER AND STORMWATER COLLECTION SYSTEMS

Reconnaissance Inspection:	Puerto Rico Aqueduct and Sewer Authority (PRASA) Puerto Nuevo Regional Wastewater Treatment Plant (RWWTP) NPDES Permit (PR0021555) Autonomous Municipality of San Juan (MSJ) Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (PRR040036)
Location Address:	University Gardens Residential Development, San Juan, Puerto Rico Coordinates: Lat. 18° 24' 10.32" N – Long. 66° 3' 44.53" W
Inspection Date:	May 28, 2015
Inspectors:	Alex O. Rivera, Environmental Engineer USEPA Region 2, Municipal Water Programs Branch (787) 977-5845 rivera.alex@epa.gov Carlos Villafañe, Environmental Engineer USEPA Region 2, Municipal Water Programs Branch (787) 977-5858 villafane.carlos@epa.gov Murray Lantner, Environmental Engineer USEPA Region 2, Water Compliance Branch 212-637-3976 lantner.murray@epa.gov
Facility Representatives:	Alexander Ávila, MSJ MS4 Inspector Virginio Matos, MSJ MS4 Inspector Carmen I. Rivera, MSJ MS4 Program Ramón Rodríguez, MSJ MS4 Inspector Marcos Lasalle, MSJ MS4 Inspector José D. Clemente, MSJ MS4 Inspector Wilfredo Molina, MSJ MS4 Inspector Jonathan Pagán, MSJ MS4 Inspector Sonia Zambrana, MSJ MS4 Inspector Luz Z. Rojas, MSJ Police Officer Jason Velez, MSJ MS4 Inspector Edson Melendez, MSJ MS4 Inspector

I. Background and inspection purpose:

On May 28, 2015, Engineers Carlos Villafañe, Murray Lantner and Alex O. Rivera, inspectors of EPA Region 2, conducted a reconnaissance inspection (RI) of the stormwater and wastewater collection systems located in University Gardens Residential Development (University Gardens) in San Juan, Puerto Rico. The inspection was performed as part of a training exercise related to the implementation of the Illicit Discharge Detection and Elimination (IDDE) element of the MSJ's MS4 Permit. The training started in the morning of May 28, 2015 with a presentation about the permit requirements and IDDE specifics and ended in the afternoon with an inspection of MSJ's stormwater collection system at University Gardens to determine the source of a wastewater discharge from MSJ's MS4 reaching the Río Piedras River that was previously identified and referred by EPA to MSJ.

The Río Piedras River discharges into the Puerto Nuevo River and subsequently into the San Juan Bay and into the Atlantic Ocean.

University Gardens stormwater collection system is part of MSJ MS4 and the wastewater collection system is part of PRASA's Puerto Nuevo RWWTP collection system. MSJ was represented by numerous members of their MS4 Program that were part of the IDDE training described above. PRASA was not represented during the inspection. The inspection was performed pursuant to the authority in Section 308(a) of the CWA. The inspection took place from approximately 2:00 PM to 3:50 PM, local time. Dry weather and cloudy skies prevailed during the inspection. All photos related to the items above were taken using a Nikon Coolpix P510 Digital Camera. Photos DSCN2152 to DSCN2174 were taken and included in **Attachment I** of this document.

EPA Inspectors conducted field screening of grab samples using Mardel Ammonia Test Strips (range from 0-6 mg/l). Note that these are not 40 CFR Part 136 approved methods, but are useful for field screening of outfalls. Ammonia has been used as a screening tool by some MS4s with severe or widespread sewage contamination. An ammonia concentration over 1 mg/l is generally considered to be a positive indicator for sewage contamination. Although some limitations have been identified, such as not detecting diluted sewage or elevated ammonia due to non-target sources such as irrigation, it does serve as a valuable screening tool (Section 12, P. 132 and 133 of the 2004 IDDE Manual http://cfpub1.epa.gov/npdes/stormwater/idde.cfm). EPA Inspectors also utilized a Chemetrics K-9400 detergent/surfactants sampling kit to conduct field testing for surfactants. Section 12.4 page 130 of the 2004 IDDE Manual indicates that surfactants concentrations in excess of 0.25 mg/l is an indicator that the discharge is contaminated with sewage or washwater.

PRASA and MSJ were notified about the preliminary inspection findings by EPA via email on May 28, 2015, the email can be found in **Attachment II**.

II. Inspection Findings and Observations:

The findings and observations of the RI are included below:

1. Dry-weather flow was observed in a stormwater catch basin located at Interamericana and Princeton Streets intersection (in front of "Colegio Sagrado Corazón" Coordinates: Lat. 18° 24' 10.24" N – Long. 66° 3' 45.00" W). The flow was observed going in direction of Princeton and Sorbona Streets intersection. Wastewater characteristics (i.e. color, odor, and algae formation) were observed.

   A grab sample was taken; using ammonia test strips the ammonia level was approximately 6 mg/l. Fluorescent green dye was poured into the catch basin to determine its flow direction at 2:36 PM.

   See photos DSCN2153 thru DSCN2156 located in **Attachment I** for more details.

2. A dry-weather flow with wastewater characteristics (e.g. color, odor, and algae formation) was observed in a stormwater catch basin located in Sorbona and Princeton Streets intersection (Coordinates: Lat. 18° 24' 8.97" N – Long. 66° 3' 46.20" W). The fluorescent green dye was observed in the catch basin around 3:07 PM. The flow was observed going in direction of the Río Piedras River.

   See photos DSCN2160 thru DSCN2161 located in **Attachment I** for more details.

3. A wastewater discharge was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection (Coordinates: Lat. 18° 24' 9.01" N – Long. 66° 3' 47.03" W). Strong wastewater odor, algae formation and grayish flow were noted.

   See photos DSCN2157 thru DSCN2159 and DSCN2162 thru DSCN2166 located in **Attachment I** for more details.

   Although the Inspectors were not able to document the fluorescent green dye reaching the Río Piedras River, the stormwater catch basin located at Princeton and Sorbona Street (see item 3) was illuminated using a flash light and the light was seen thru the discharge pipe. As described in paragraph 2 the dye reached the Princeton and Sorbona catch basin meaning that the sewage discharge does ultimately discharge from this outfall. The pipe is partially obstructed and hindering the flow coming from Sorbona and Princeton Streets intersection.

4. Significant amount of dry-weather flow with wastewater characteristics (e.g. color, algae formation and foam formation) was observed flowing from a rectangular outfall located south of Princeton and Sorbona Streets intersection and discharging into the Río Piedras River (Coordinates: Lat. 18° 24' 8.54" N – Long. 66° 3' 46.28" W).

   A test for surfactants was performed; the surfactants levels were greater than 3 ppm. A grab sample was taken and using ammonia test strips the ammonia level was approximately 6 mg/l.

   See photos DSCN2167 and DSCN2174 located in **Attachment I** for more details.

5. The wastewater manhole at Palma Real and Duke Street intersection was found full and with solids (i.e. grease) accumulation. The wastewater manhole is located at Coordinates: Lat. 18° 24' 14.86" N – Long. 66° 3' 36.16" W.

   The stormwater trench inlet located in the same intersection (southwest of the wastewater manhole) was found with presence of dry-weather flow with wastewater characteristics (e.g. color, odor, and algae formation). The wastewater was observed flowing from the trench inlet inner wall and reaching a stormwater collection system that flows in direction of Interamericana Street.

   The intersection stormwater trench inlet is divided in two sections, one that flows into a concrete pipe similar to the one described in item 3, and other that flows thru a rectangular type of channel similar to the one described in item 4.

   See photos DSCN2169 and DSCN2168 located in **Attachment I** for more details.

6. EPA has conducted Reconnaissance Inspection at the 2 outfalls described in paragraphs 3 and 4 above in March, 2012; July 2012 and January 2013 and these reports were transmitted to both MSJ and PRASA. In response to the March 2012 Inspection, PRASA stated in a letter dated September 6, 2012 that they fixed a broken sanitary line at Loyola and Interamericana on July 14, 2012. Despite this correction EPA sampling at on July 18, 2012 still continued to show the presence of sewage at outfalls in University Gardens. PRASA's response to this July 2012 dated June 10, 2013 indicated that they did not identify any problems at Sorbona and Princeton and that they would reschedule a visit to Calle Sorbona and Loyola. EPA also identified sewage flowing from the 48" pipe described in paragraph 3 above during a January 2013 Reconnaissance inspection conducted by canoe on the Rio Piedras River. No PRASA or MSJ reply was received in response to the January 2013 Inspection as requested by EPA. PRASA/MSJ must work to solve the problems of the illicit discharges and connections in University Gardens.

III. Conclusion

Wastewater is a pollutant as defined by Section 502(6) of the Clean Water Act (Act), 33 U.S.C. § 1362. The Río Piedras River and its tributaries are considered Waters of the United States as defined by the Act. University Gardens MS4 and PRASA's Wastewater Collection Systems are point sources as define by the Act. University Gardens Storm Water Collection System is an appurtenance of the MSJ and is a point source as define by the Act. University Gardens Wastewater Collection System is an appurtenance of PRASA and is a point source as define by the Act. University Gardens Wastewater Collection System discharge by gravity wastewater into MSJs MS4. MSJ and PRASA does not have an NPDES permit to discharge the pollutants (e.g. sewage, wastewater solids) that were observed in MSJ MS4.

MSJ and PRASA shall take the necessary actions to cease discharging wastewaters into Waters of the United States. The response to this report shall include all the details, evidence, and results of such actions.

End of Report

Report prepared by: _____ Dated: 6/8/15

Eng. Alex O. Rivera
Environmental Engineer

Attachment I – Photo Log and Location Map

Attachment II – EPA May 28, 2015 email notifying PRASA and MSJ about the findings at University Gardens Residential Development Collection Systems

Attachment I

EPA 5-28-15 University Gardens Res. Development Collection Systems RI – Photo Log and Location Map

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2152 – View of a wastewater manhole located in Sorbona and Princeton Streets intersection.

DSCN2153 – View of the Interamericana and Princeton Streets intersection. A stormwater catch basin located in the intersection and in front of the Sagrado Corazón School was found with dry-weather flow with wastewater characteristics.

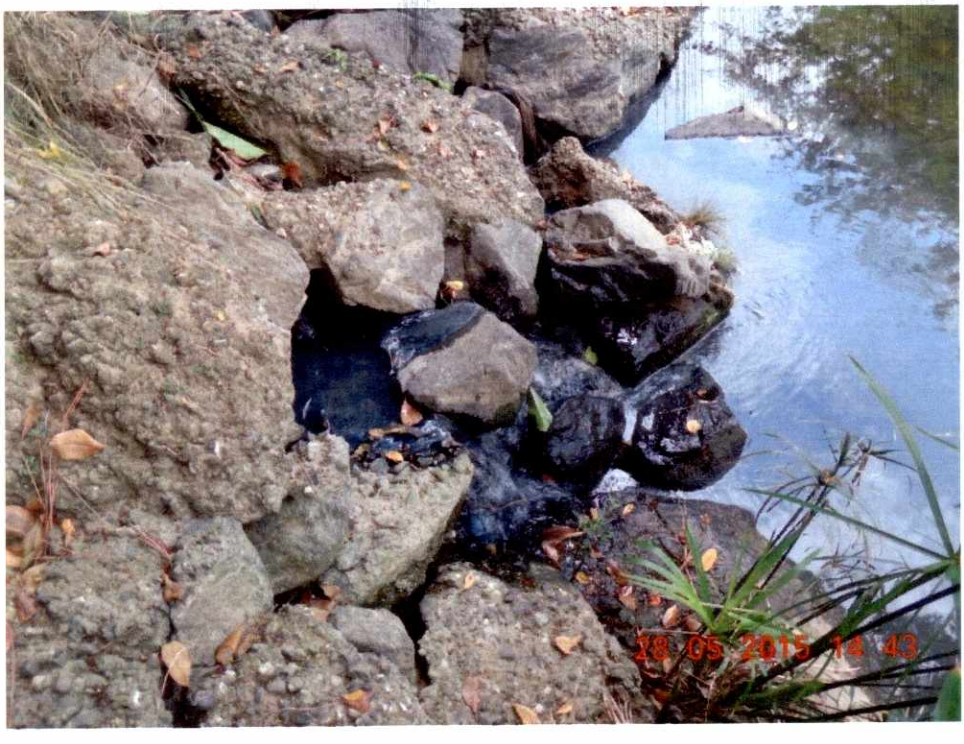
Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2154 – View of the bottom of a stormwater catch basin located at Interamericana and Princeton Streets intersection. The catch basin was found with dry-weather flow with wastewater characteristics.

DSCN2155 – Additional view of the bottom of the stormwater catch basin located at Interamericana and Princeton Streets intersection. The catch basin was found with dry-weather flow with wastewater characteristics. A grab sample was taken and using ammonia test strips the ammonia level was approximately 6 mg/l.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2156 – Additional view of the bottom of a stormwater catch basin located at Interamericana and Princeton Streets intersection. The catch basin was found with dry-weather flow with wastewater characteristics. Fluorescent green dye was poured into the catch basin to determine its flow direction.



DSCN2157 – A wastewater discharge was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection (Coordinates: Lat. 18° 24' 9.01" N – Long. 66° 3' 47.03" W). Strong wastewater odor, algae formation and grayish flow were noted.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2158 – Additional view of the wastewater discharge that was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection. Strong wastewater odor, algae formation and grayish flow were noted. The flow is discharged thru a displaced section of the pipe.

DSCN2159 – Additional view of the wastewater discharge that was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection Strong wastewater odor, algae formation and grayish flow were noted. The flow is discharged thru a displaced section of the pipe.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2160 – View of the bottom of a stormwater catch basin located in Princeton and Sorbona Streets intersection. A dry-weather flow with wastewater characteristics (e.g. color, odor, and algae formation) was observed

DSCN2161 – View of the bottom of a stormwater catch basin located in Princeton and Sorbona Streets intersection. A dry-weather flow with wastewater characteristics (e.g. color, odor, and algae formation) was observed. The fluorescent green dye poured in the Interamericana and Princeton Street intersection stormwater catch basin appeared at the catch basin. The catch basin flows in direction of the Río Piedras River thru the 48 inches pipe described in photos DSCN2157 thru DSCN2159.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2162 – Additional view of the wastewater discharge that was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection. Strong wastewater odor, algae formation and grayish flow were noted. The flow is discharged thru a displaced section of the pipe.

DSCN2163 – Additional view of the wastewater discharge that was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection. Strong wastewater odor, algae formation and grayish flow were noted. The flow is discharged thru a displaced section of the pipe. The pipe is partially obstructed and hindering the flow coming from Sorbona and Princeton Streets intersection.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2164 – Additional view of the wastewater discharge that was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection. Strong wastewater odor, algae formation and grayish flow were noted. The flow is discharged thru a displaced section of the pipe.

DSCN2165 – Additional view of the wastewater discharge that was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection. Strong wastewater odor, algae formation and grayish flow were noted. The flow is discharged thru a displaced section of the pipe.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2166 – Additional view of the wastewater discharge that was found reaching the Río Piedras River from an approximately 48 inches diameter concrete pipe located southwest of Princeton and Sorbona Streets intersection. Strong wastewater odor, algae formation and grayish flow were noted. The flow is discharged thru a displaced section of the pipe.

DSCN2167 – View of a rectangular outfall located south of Princeton and Sorbona Streets intersection (Coordinates: Lat. 18° 24' 8.54" N – Long. 66° 3' 46.28" W). Significant amount of dry-weather flow with wastewater characteristics (e.g. color, algae formation and foam formation) was observed. A test for surfactants was performed; the surfactants levels were 3 ppm. A grab sample was taken and using ammonia test strips the ammonia level was approximately 6 mg/l.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2168 – Partial view of the discharge from a rectangular outfall located south of Princeton and Sorbona Streets intersection. Significant amount of dry-weather flow with wastewater characteristics (e.g. color, algae formation and foam formation) was observed reaching the Río Piedras River. A test for surfactants was performed; the surfactants levels were 3 ppm. A grab sample was taken and using ammonia test strips the ammonia level was approximately 6 mg/l.

DSCN2169 – View of a wastewater manhole at Palma Real and Duke Streets intersection was found full and with solids (i.e. grease) accumulation.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2170 – View of Palma Real and Duke Streets intersection.

DSCN2171 – Partial view of the inner part of a stormwater trench inlet located in Palma Real and Duke Streets intersection (southwest of the wastewater manhole) was found with presence of dry-weather flow with wastewater characteristics (e.g. color, odor, and algae formation). The wastewater was observed flowing from the trench inlet inner wall.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

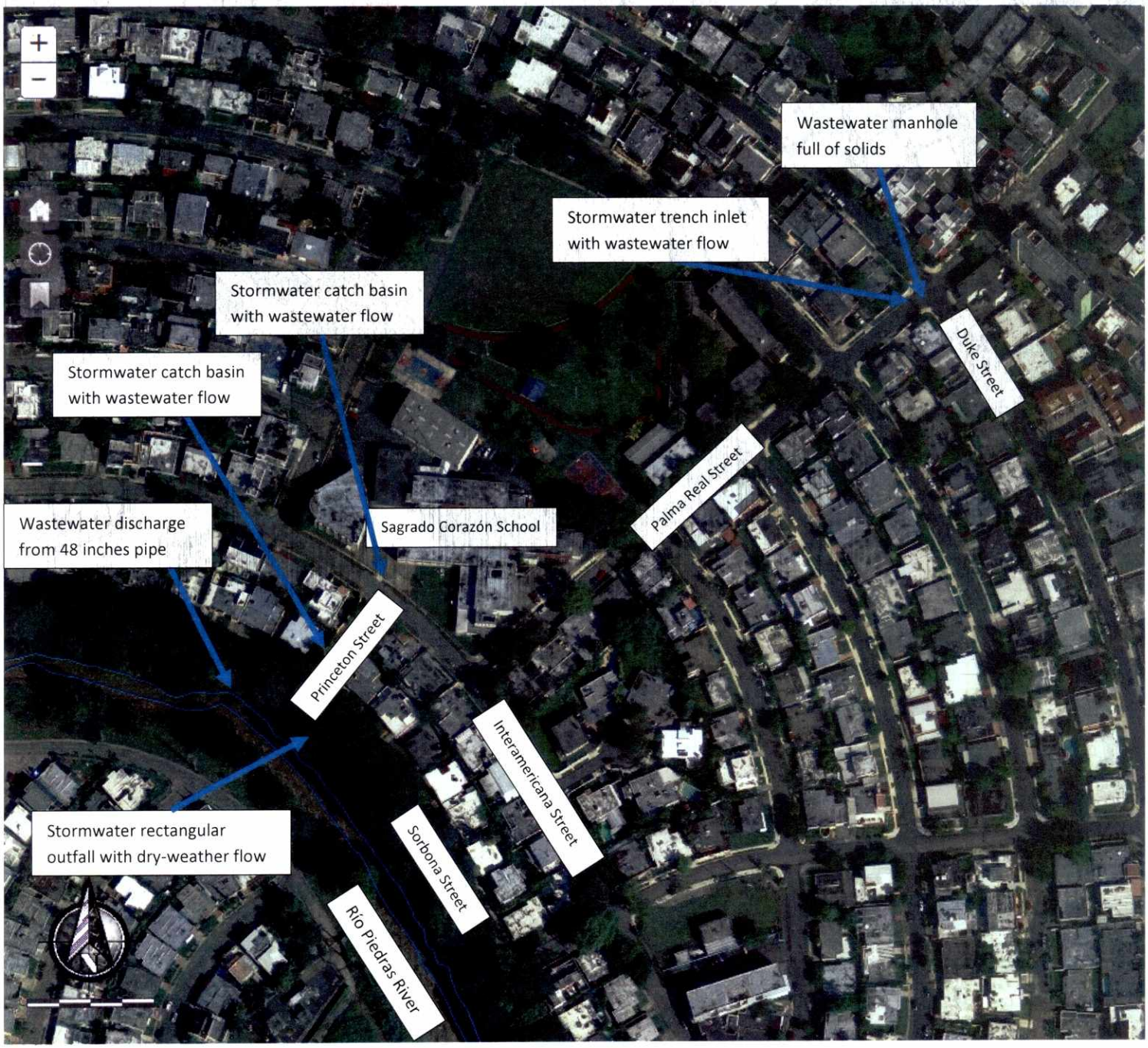
DSCN2172 – Partial view of Palma Real and Duke Streets intersection stormwater trench inlet. The intersection stormwater trench inlet is divided in two sections.

DSCN2173 – Partial view of a stormwater manhole located in Palma Real and Duke intersection.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map

DSCN2174 – Additional view of the inner part of a stormwater trench inlet located in Palma Real and Duke Streets intersection (southwest of the wastewater manhole) was found with presence of dry-weather flow with wastewater characteristics (e.g. color, odor, and algae formation). The wastewater was observed flowing from the trench inlet inner wall.

Attachment I: EPA May 28, 2015 Reconnaissance Inspection at University Gardens Residential Development Storm Water and Wastewater Collection Systems - Photo Log and Location Map



Source: Puerto Rico Planning Board GIS Application (http://gis.jp.pr.gov/mipr/)

Attachment II

EPA May 28, 2015 Email notification to PRASA

Rivera, Alex

From: Rivera, Alex
Sent: Thursday, May 28, 2015 6:24 PM
To: 'Christie.MOTA@acueductospr.com'; 'Yanira.COSME@acueductospr.com'; 'Emma.BLANCO@acueductospr.com'; 'Hector.CEPEDA@acueductospr.com'
Cc: Geliga, Jaime; 'Alexander Avila Sánchez'; Noelia Y. Rosa Jaime; Lantner, Murray; Villafane, Carlos; 'Omar Pérez'; <rmorales@estuario.org>; 'Jorge Bauzá'; Annette Feliberty Ruiz
Subject: Descarga sanitaria Urb. University Gardens Intersección Calle Palma Real y Calle Duke
Attachments: DSCN2172 (800x600).jpg; DSCN2174 (800x600).jpg; DSCN2169 (800x600).jpg

Saludos:

Durante la tarde de hoy visitamos la Urbanización University Gardens y encontramos una descarga sanitaria alcanzando afectando el sistema pluvial en la intersección de la Calle Duke con la Calle Palma Real. La foto DSCN2169 muestra la condición del sistema sanitario en dicha intersección, el manhole sanitario se encontró con niveles altos y con acumulación de grasa. Las aguas usadas están siendo descargadas a través de la pared del interior de la alcantarilla pluvial en la foto DSCN2172, la descarga puede ser observada en la foto DSCN2174 también incluida en el mensaje. Como pueden ver en el mapa incluido, las aguas negras transcurren en el sistema pluvial hasta ser descargadas en el Rio Piedras. Necesitamos que esta situación se investigue lo antes posible y que se nos provean los detalles y resultados de las acciones a tomarse.

Gracias;

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